HOMELESS SERVICES OVERSIGHT COUNCIL (HSOC)
Data & Performance Committee Meeting Agenda

September 21, 2026, 10:00 am

Committee members must participate in person (except for just cause reasons, or personal emergency reasons approved by the HSOC)

Room 356, County of San Luis Obispo Department of Social Services
3433 South Higuera St., San Luis Obispo, CA 93401

Members with approved just cause reasons and the public may participate by Zoom video call:

https://us06web.zoom.us/j/87495821923?pwd=mShzVnLDhCXfPUMhYHdxgXTZO0zDz1.1

Or dial in:
+1 669 444 9171
Meeting ID: 874 9582 1923
Passcode: 544956

1. Call to Order and Introductions (2 minutes*)

2. Public Comment (3 minutes*)

3. Consent: Approval of Minutes (2 minutes*)

4. Action/Information/Discussion

   4.1. Implementing Five-Year Plan Line of Effort 3 – Improve and Expand Data Management Efforts Through HMIS and Coordinated Entry System to Strengthen Data-Driven Operational Guidance and Strategic Oversight

      4.1.1. Homeless Management Information System (HMIS)

         4.1.1.1. Action Item: Approve Data Quality Management Plan (15 minutes*)

         4.1.1.2. Discussion Item: Review Full HMIS Policies and Procedures (15 minutes*)

         4.1.1.3. Information Item: ICA Site Visit – HMIS Phase III Planning (10 minutes*)

         4.1.1.4. Information Item: System Performance Measure 2 (SPM 2): Returns to Homelessness (10 minutes*)

      4.1.2. Data and Performance Ad Hoc Workgroup

*All times are approximate

4.1.2.1. Staff Update (30 minutes*)

5. Future Discussion/Report Items (3 minutes*)

6. Next Regular Meeting: October 19, 2026

7. Adjournment

The full agenda packet for this meeting is available on the SLO County HSOC web page: https://www.slocounty.ca.gov/Departments/Social-Services/Homeless-Services/Homeless-Services-Oversight-Council-(HSOC).aspx

*All times are approximate

HOMELESS SERVICES OVERSIGHT COUNCIL (HSOC)
DATA & PERFORMANCE COMMITTEE MEETING MINUTES

Date
August 17, 2026

Time
10:03 a.m.-11:30 a.m.

Location
Room 356, Department of Social Services, 3433 S. Higuera St., San Luis Obispo, CA 93401

Members Present
Devon McQuade
Diana Howard
Crystal Racicot (alternate for Mark Lamore)
Jessica Thomas
Nathan Rubinoff
Ranel Porter

Members Absent
Helene Finger
Mark Frauenheim

Staff and Guests
Abby Burgess
Alexis Ramirez
Berenice Andrade
Derek Ferree
Erica Jaramillo
Jeff Al-Mashat
Kate Bourne
Kayleigh Hollum
Laurel Weir
Merlie Livermore
Susan Funk
Thomas Crottogini

1. Call to Order and Introductions
Devon, on behalf of Mark Lamore, called the meeting to order at 10:03 a.m.

2. Public Comment
There were no public comments presented.

3. Consent: Approval of Minutes
Ranel moved to approve the minutes and Nathan seconded the motion. The minutes were approved by voice vote.

4. Action/Information/Discussion

4.1. Implementing Five-Year Plan Line of Effort 3 – Improve and Expand Data Management Efforts Through HMIS and Coordinated Entry System to Strengthen Data-Driven Operational Guidance and Strategic Oversight

4.1.1. Homeless Management Information System (HMIS)

4.1.1.1. Action Item: Data Quality Management Plan

Final draft to be finalized and shared at the next meeting.

4.1.1.2. Discussion Item: Full HMIS Policies and Procedures

Copy to be shared with committee members for discussion at the next meeting.

4.1.1.3. Information Item: System Performance Measure 1: Length of Time Persons Experience Homelessness

Kate presented information on System Performance Measure 1 (SPM 1), based on data from October 1, 2025, through July 31, 2026.

4.1.2. Data and Performance Ad Hoc Workgroup

Laurel presented the initial set of recommendations from the workgroup, which includes Mark Lamore, Mark Frauenheim, Devon McQuaid, and Jeff Al-Mashat. The topics addressed included gaps analysis, PIT Count methodology, Data Quality standards, and reviews of System Performance Measures.

Abby also provided the following links: System Performance Improvement Brief: Strategies for System Performance Improvement - May 2017

System Performance Measures Programming Specifications: FY 2026 System Performance Measures HMIS Programming Specifications

4.1.2.1. Staff Updates

No staff updates were reported.

5. Future Discussion/Report Items

- Data Quality Management Plan final draft (with incorporated suggestions from Mark F.)
- HUD SPM
- Ad Hoc Workgroup report

6. **Next Regular Meeting**: September 21, 2026

7. Adjournment

Devon adjourned the meeting at 11:30 a.m.

COUNTY OF SAN LUIS OBISPO
DEPARTMENT OF SOCIAL SERVICES
HOMELESS SERVICES DIVISION

HMIS Data Quality Management Plan

DQMP
Version Number 2
Status: Draft
Approvers: HSOC Data & Performance Committee

CONTENTS

DOCUMENT CONTROL

Change Log

Date	Changed By	Description	Reviewed by	Effective Date
12/11/2023	Abby Burgess, Zach Ehmann, Jessica Jones	Initial Version	HSOC Finance & Data	March 2024
8/26/2024	HMIS Lead Staff	Minor edits and addition of Appendix A	HSOC Data & Performance	January 2025
September 2026	HMIS Lead Staff			

INTRODUCTION

Purpose

The San Luis Obispo County CoC Data Quality Management Plan (DQMP) articulates the Continuum of Care (CoC) goal to continuously improve the completeness, timeliness, accuracy, and consistency of its data and establishes the policies and procedures for meeting this goal as a community. Achieving the highest level of data quality possible allows for accurate reporting, analysis, and provides justification for system funding. This document aims to provide all participating entities with a shared context for the plan and a clear understanding of their roles and responsibilities in its execution.

CoC Data Systems

The sections below define the two types of databases that are subject to this DQMP. Collectively, these are referred to as the CoC Data Systems. For both system categories, HUD data elements are grouped into four types- Universal Data Elements (UDEs), Program Specific Data Elements (PSDEs), and Project Data Descriptor Elements (PDDEs). These are designations derived from the HUD Data Dictionary. Administrative Data Elements reflect measures of data quality that are derived from data system metadata and calculated performance metrics rather than a discrete field in a database. Further description of data element categories and their conventions can be found in Appendix B- HMIS Data Types and Conventions. Users should become familiar with these during their new user onboarding.

Homeless Management Information System

HMIS serves as the primary system of record for all State and Federally funded projects providing housing and/or services to those who are homeless, at risk of homelessness, or would be homeless without the assistance provided. Clarity Human Services is administered by San Luis Obispo County Homeless Services Division as the CoC's designated HMIS Lead, and the software vendor is Bitfocus. The required structure and baseline functionality of the system is defined according to the HMIS Data and Technical Standard Final Notice (July 2004).

DV Comparable Databases

CoC-participating Victim Service Providers (VSPs) that are funded to serve survivors of domestic violence are prohibited from participating in the CoC's designated HMIS and instead are required to utilize a "comparable database" that mirrors the capability of HMIS while complying with stricter privacy regulations. VSPs that receive HUD funding are still required to contribute to the CoC's reporting through the provision of aggregate data and through limited client-permitted data sharing for service coordination. Requirements are documented in the HMIS Comparable Database Manual.

COC, HMIS LEAD AND HMIS PROVIDER STAFFING

Roles and Responsibilities

List the key stakeholders involved in this procedure. For each stakeholder, specify their roles and responsibilities related to the Data Quality Plan. Clearly define any specific tasks or obligations they have.

Title	**Description of Role**	**Tasks**
HMIS Program Analyst	Management of HMIS Assigned initiative (PIT, etc.) and policy issues. Vendor management.	Oversight, review, and support of policy and procedures. Ensure adherence to data quality management plan, monitoring process and compliance.
Business Systems Analyst	Lead on system administration and data / reporting.	System Administration tasks. Ensure data quality reports are available and accurate. Create self-monitoring tools for data quality. Assist in identification and correction of data quality issues with HMIS Providers.
Implementation Partner	Provide subject matter expertise and technical assistance to Homeless Services Department and HMIS Team.	Understand data quality elements required by HUD and Federal Partner programs. Systematically monitor the data. Communicate regularly with CoC and HMIS Providers to ensure resources are available to address data quality concerns. Support creation of data quality management plan and subsequent tools/ reports to support the implementation of the plan.
HSOC Data and Performance Committee (or designated sub-	HMIS Oversight	Review and approve data quality plan. Set data quality

committee for HMIS Data and Reporting functions)		benchmarks. Review data quality reports. Determine expectations for monitoring and compliance. Work with providers and the HMIS lead to develop and implement solutions for improving data quality. Consider data quality in the rating and ranking process for funding decisions.
HMIS Providers/ Participating Agencies	Adherence to HMIS policies and procedures, including the data quality management plan.	Set the tone for the agency's commitment to data quality. Monitor a project's data quality. Prepare for APR/ funding report requirements. Resolve any data quality findings as quickly as possible
HMIS Agency Administrator (s)	Serve as the primary contact (s) for all communications regarding the quality of data entered in CoC data systems.	Serve as a subject matter expert for the HMIS Provider. Support agency end users with system navigation and data quality. Ensure end users receive necessary training for HMIS. Maintain quality and accuracy of client data, user data and project information for the agency. Communicate project and funding updates and change to HMIS Lead, including changes to bed/ unit inventory. Review project set up requests and custom report request prior to submission to HMIS Lead.

HMIS End Users	HMIS Data Entry and adherence to HMIS policies and procedures, including the data quality management plan.	Enter data with completeness, accuracy, timeliness, and consistency.

HMIS DATA QUALITY RESOURCES

HUD's existing HMIS documentation and guidance serves as a key reference point for the CoC DQMP. The HUD Exchange links below provide access to the most recent versions of relevant documents considered in the formulation of the DQMP:

- HMIS Data Standards (*HMIS Data Dictionary* & *Data Standards Manual,* updated biannually)
- CoC Data Quality Brief (May 2017)
- System Performance Improvement Briefs (July 2017)
- SNAPS Data TA Strategy to Improve Data and Performance (September 2018)

DATA QUALITY STANDARDS AND BENCHMARKS

This document defines “Administrative Data Quality Measures” as metrics derived from other HMIS elements that establish validity or describe the relationship between data captured in the CoC data systems and the overall amount of data available in the community it is charged with collecting.

- **Timeliness** refers to the number of days between when information was effective and when that information was entered into the CoC Data System.

- **Bed/Unit Coverage** refers to the percentage of non-VSP homeless-serving projects’ residential capacity and utilization is captured in HMIS. It is a function of a project’s overall HMIS-participation status. The CoC aims to have this be as close to 100% as possible.

- **Utilization** refers to the occupancy percentage for available units/beds in CoC residential projects. Overly high or low utilization may reflect issues with PDDE data that must be corrected by data system administrators.

- **User Metadata** are captured automatically by CoC Data Systems and are used to understand the patterns of system access and data entry for organizations.

Data Quality Standards

The table below the next page shows the minimum benchmarks within each sub-component of the DQMP. In cases where sub-components encompass multiple data elements, the standard applies equally to each element rather than being an average of performance across elements. Sub-sections following this table provide additional information on these sub-components and procedural requirements that go beyond the data quality benchmarks listed. These percentages can be generated through the reporting tools described in the Self-Monitoring Tools section of this document.

Data Quality Benchmark Minimums by Project Type	CE	HP	ES (E/E)	ES (NbN)	PSH / OPH	RRH	SO[1]	SSO	TH
Project Descriptor Data Elements (PDDEs) (Completeness)	95%	95%	95%	95%	95%	95%	95%	95%	95%
Completeness: Universal Data Elements (UDEs)	90%	90%	80%	80%	95%	95%	80%*	80%	90%
Completeness: Program Specific Data Elements (PSDEs)	90%	90%	80%	80%	95%	95%	80%*	80%	90%
Timeliness	95%	95%	95%	95%	95%	95%	95%	95%	95%
Accuracy	95%	95%	95%	95%	95%	95%	95%	95%	95%
Consistency[2]	95%	95%	95%	95%	95%	95%	95%	95%	95%
CoC Data System Bed/Unit Coverage: Federally Funded	N/A	N/A	100%	100%	100%	100%	N/A	N/A	100%
CoC Data System Bed/Unit Coverage: Non-Federally Funded	N/A	N/A	85%	85%	85%	85%	N/A	N/A	85%
Bed Utilization	N/A	N/A	65% - 105%	65% - 105%	85% - 105%	85% - 105%	N/A	N/A	65% - 105%

[1] For UDE & PSDE Completeness, only considers clients with a Date of Engagement in the period, indicating that the client has agreed to actively participate in case management services.
[2] Depending on the element, calculated based on either level of individual administrative events or agency users.

Project Type Key			
CE	Coordinated Entry	**RRH**	Rapid Re-housing
HP	Homelessness Prevention	**SO**	Street Outreach
ES (E/E; NbN)	Emergency Shelter (Entry/Exit workflow; Night-by-Night workflow)	**SSO**	Supportive Services Only
PSH / OPH	Permanent Supportive Housing / Other Permanent Housing	**TH**	Transitional Housing

Standards for Project Descriptor Data Elements (PDDEs)

As CHOs do not enter PDDE information directly, meeting PDDE benchmarks requires active participation in CoC Data System information gathering and monitoring processes. In addition to responding to *ad hoc* requests for information in a timely manner, **CHO's are required to notify the CoC data system leads of any project and funding changes (including updates to bed/unit inventory) by the 5th business day of month immediately following the month the update/change occurs.** Updates and changes to PDDEs in HMIS can be communicated to the CoC HMIS System Administrator by submitting an (HMIS Project Set Up Form or Change Form TBD).

Standards for Client, Enrollment, & Assessment Data (UDEs & PSDEs)

In its CoC Data Quality Brief, HUD identifies data quality for client, enrollment, and assessment data as having four components: completeness, timeliness, accuracy, and consistency. The tables below provides a brief overview of these components, whereas the following sections address the standards the DQMP applies to Participating Agencies.

Completeness	Timeliness	Accuracy	Consistency
All clients entered	Data are entered soon after collection	Truthfulness from clients	Common interpretation of questions
Complete identifying data entered	Changing data are kept up to date	Accurate data entered by staff	Common interpretation of client answers
Complete characteristics fields entered		Logical discrepancies between data elements	Common knowledge of what fields are required

All required enrollment, service, assessment, and exit data entered		entered for the same client are minimized	

Completeness

HUD's CoC Data Quality Brief defines data completeness as "The degree to which all required data is known and documented." For the purposes of the DQMP's standards, completeness is measured as the percentage of non-missing values for each non-administrative HMIS data element at each point of data collection.

The San Luis Obispo County CoC encourages all CHOs contributing to its data systems to aspire to 100% collection of all data elements but recognize that this may not be realistic or possible in all cases. To further support continuous data improvement in this area, the CoC has created minimum percentage requirements for data completeness, which apply equally to each element of the UDE and PSDE data types, respectively.

Timeliness

The San Luis Obispo County CoC encourages all participating agenciesto aspire to 100% of data being entered into CoC Data Systems in a live and timely manner to facilitate HMIS being a tool for day-to-day business operations. However, the CoC recognizes that this may not be realistic or even possible in all cases, and therefore have created the following minimum requirements for data timeliness based on project type:

Project Type	Client Event	Timeliness Standard (time between event occurrence and data entry)
Coordinated Entry	Current Living Situation	Within **48 business hours** of client contact/service
	Entry	Within **48 business hours** of client contact/service
	Exit	Within **48 business hours** of client contact/service
Homelessness Prevention	Entry	Within 3 business daysof client contact/service
	Exit	Within **72 business hours** of client contact/service
Emergency Shelter (Entry Exit workflow)	Entry	Within **72 business hours** of client contact/service
	Exit	Within **72 business hours** of client contact/service

Project Type	Client Event	Timeliness Standard (time between event occurrence and data entry)
Emergency Shelter (Night-by-Night workflow)	Current Living Situation	Within **72 business hours** of client contact/service
	Entry	Within **72 business hours** of client contact/service
	Exit	Within **72 business hours** of client contact/service[3]
Permanent Supportive Housing / Other Permanent Housing	Entry	Within **72 business hours** of client contact/service
	Move-in	Within **72 business hours** of client contact/service
	Exit	Within **72 business hours** of client contact/service
Rapid Re-housing	Entry	Within **72 business hours** of client contact/service
	Move-in	Within **72 business hours** of client contact/service
	Exit	Within **72 business hours** of client contact/service
Street Outreach	Entry	Within **72 business hours** of client contact/service
	Current Living Situation	Within **72 business hours** of client contact/service
	Exit (completed or terminated program)	Within **72 business hours** of client contact/service
	No-Contact Exits	After 90-days of no contact, project exit needs to be recorded by the end of the 93rd day of no-contact.
Supportive Services Only	Entry	Within **72 business hours** of client contact/service
	Exit	Within **72 business hours** of client contact/service
Transitional Housing	Entry	Within **72 business hours** of client contact/service
	Exit	Within **72 business hours** of client contact/service

[3] Users should back-date to the date of last shelter night stay, NOT the date the client did not return.

Accuracy

Data quality measures of accuracy consider the degree to which the information present in CoC Data Systems reflect the actual situations of clients. Data accuracy is not easy to manage or monitor, requiring reference to sources of documentation external to CoC Data Systems as well as regular auditing of responses in the data systems for internal logical congruence.

External Record Standard

To ensure accurate reporting of events, CoC leadership will cross-reference CoC Data System data against internal agency documentation as part of the annual HMIS monitoring process. **The goal is that 100% of client external agency records match the client's information entered into the CoC Data Systems, but a minimum of 95% is acceptable.**

Data System Correction Standard

Due to the complexity of data accuracy, specific standards have not been developed. Some amount of data incongruity may be unavoidable; however, CHO's should strive to minimize data incongruity that occurs. It is expected that CHOs will respond to requests to correct internal Data System accuracy errors within the timeframe parameters of the request. It is expected that accuracy corrections may be included as part of the quarterly Data Quality Monitoring process.

Known accuracy issues that may be included in cleanup requests will be updated in this plan after review of the new HMIS software system logics and common data quality issues.

Consistency

Data consistency means that data is understood, collected, and entered in the same way across all projects in CoC Data Systems. The CoC Lead will work with CoC Administrative Partners to ensure congruence across data systems, while CHOs are expected to meet the following standards by through their user management practices.

Initial User Training Standard

All CHO's data-contributing staff must complete an initial training prescribed by the CoC & HMIS Leads before being granted access to any of the CoC Data Systems. **It is expected that this training will be completed within 15 business days of assignment.**

Annual User Training Standard

For HMIS users, the CoC has established minimum annual HMIS training requirements.

User Activity Standard

End users must log into each CoC Data System to which they have access at least once in a 90-day period to maintain active user status. After 90-days of no use, the user account will be made inactive by the data system administrator.

CoC Data System Bed/Unit Coverage

Bed coverage is the number of homelessness services program beds in the CoC's geographic area that contribute data to the CoC Data Systems. The following project types are considered for this measure:

- Emergency Shelter (ES)
- Transitional Housing (TH)
- Rapid Re-Housing (RRH)
- Permanent Supportive Housing (PSH)
- Other Permanent Housing (OPH)[4]

As a lack of bed coverage limits the CoC's ability to evaluate its clients needs and project performance in addition to reducing the overall comprehensibility of its Data Systems, ensuring that bed coverage is as close to 100% is a high priority for CoC leadership. CoC leadership will focus on project types in the CoC that have less than 85% bed coverage for improvement efforts.

Bed Utilization

Utilization applies to residential (shelter and housing) projects and is measured as the percentage of project inventory that is being used to shelter/house a client in a given period. This measure not only serves to identify issues with client access to resources or bottlenecks in referral processes but also can serve as an indication of inaccurate or incomplete inventory or enrollment data.

The CoC acknowledges that the factors impacting utilization differ between project types and has set benchmarks accordingly. **Emergency Shelter & Transitional Housing projects are to maintain bed utilization between 65% - 105%. Permanent housing**

[4] Includes "Housing without Services" and "Supportive Housing without Services" designations.

projects are to maintain bed utilization between 85% - 105%.

Situations where a change in inventory records is necessary are defined by HUD in the Data Standards Manual. Refer to the PDDE Data Quality Standards for the requirements for reporting inventory changes.

Missing Data Responses to HMIS Elements

Required HMIS data elements left blank in CoC data systems are considered "missing" for data quality purposes. However, to distinguish between cases where data collection was not attempted or recorded and those where a client declined to provide the information, most required HMIS data elements provide the options "Client doesn't know," "Client prefers not to answer," and/or "Data not collected" to be recorded in place of a blank value. **Although non-blank, these *may* have a negative impact on data quality.**

It is not the intention of HUD, Federal Partners, or the San Luis Obispo County CoC that clients be denied assistance if they refuse or are unable to supply the information. However, some information may be required by projects or public or private funders to determine eligibility for housing or services or to assess service needs.

Usage of "Client Prefers Not to Answer" and "Client Doesn't Know" Responses

These options are considered poor data quality but are provided to allow a response to be recorded for elements required to proceed with an assessment when a client is unwilling or unable to provide a response. These are never to be used in place of asking a client for information or in a situation where there was no opportunity to collect information. It is expected that service providers will attempt to collect responses to all required fields and develop rapport with clients to encourage responsiveness.

Usage of "Data Not Collected" Response

CoC data systems may require users to input a non-blank response for required HMIS data elements. In cases where information was not collected or is unknown to the end user entering the data, this response may be used. However, it is expected that this will be a last resort when information cannot be obtained through reference of other records or consulting the client.

Automatic Exits & Exit Destination Completeness in HMIS

Upon agency request and subject to existing policies and procedures, CoC HMIS system administrators may set up projects to automatically exit clients after a set number of days of non-activity. This approach is most often employed to reduce data entry burden and address Exit record timeliness issues for Street Outreach projects and Emergency Shelter projects utilizing a Night-by-Night workflow. However, their use comes with significant trade-offs for data quality: faulty exits may be created if contact/bed night services are not recorded in a timely manner, and all system-generated exits will have missing data for the Exit Destination element. At this time, there is no uniform requirement to utilize either an automated or manual workflow. CoC leadership reserves the right to approve or deny automation requests based on the expected impact to data quality.

SELF-MONITORING TOOLS

CHOs are encouraged to self-monitor their data quality performance using reports available in the CoC Data Systems. This section details resources that are currently available for self-monitoring.

HUD Data Quality Report

The HMIS Lead recommends that Participating Agency Administrators run the HUD HMIS Data Quality Report to self-monitor **completeness** data quality for the HMIS Universal Data Elements (UDEs). Additionally, this report can be used to verify that enrollment data is up to date by comparing overall client counts against other data sources.

Documentation for running and interpreting this report can be found (future HelpScout Knowledge Base article) and technical specifications can be found within the HUD Standard Reporting Terminology Glossary.

APR & CAPER Reports

The HMIS recommends that CHOs run the CoC / ESG APR and CAPER reports to self-monitor **completeness** data quality for the Program Specific Data Elements (PSDEs). The APR & CAPER reports also provide more detail for **accuracy verification** and **Entry/Exit timeliness monitoring** than the HUD Data Quality Report, including demographic breakouts, client resources and barriers, and program-specific performance measures (e.g., number of outreach contacts prior to engagement; days from enrollment to housing move-in).

EVA Reporting Tool

The HMIS Lead also recommends that HMIS Participating Agencies utilize HUD's Eva reporting tool to conduct a detailed review of errors. Instructions on where to find the Eva tool and how to run the report can be found at the San Luis Obispo HMIS Knowledge Base. HMIS Lead staff will periodically provide these reports to Agencies as part of ongoing data quality monitoring efforts described in the section below.

Other Report Library Tools

HMIS provides a standard set of user-run reports that should be utilized for data quality self-monitoring. Agency or project-level reports may be run immediately or scheduled, and are easily exportable after running. Users and Administrators can visit the SLO HMIS Knowledge Base to review available reports and their uses.

DATA QUALITY MONITORING PROCESSES

Routine data quality monitoring at the CoC, Agency, project, and user level will be conducted by the CoC HMIS Lead (in collaboration with Administrative Partners for non-HMIS systems) to ensure the CoC and meet the data quality goals defined in this DQMP. In response to findings from monitoring, the CoC HMIS Lead will request corrections and provide support to improve the quality of data at the point of entry into the CoC Data Systems.

The HMIS Lead will perform monthly data quality checks on the HMIS data, which will include the following steps:

- Run latest version of the HUD Eva Data Quality Tool
- Notify Partner Agency Administrator via email of findings and timelines for correction;
- Re-run reports for errant agencies/programs, as requested. Follow up with Partner Agency Administrators if necessary;
- Notify Agency Executive Director if Partner Agency Administrators are not responsive to required corrective actions; and
- Share aggregate Data Quality trends with HSOC Data & Performance

In addition to monthly project-level data quality checks, the HMIS Lead will review system and agency-level data quality prior to the submission of the Federal Longitudinal Systems Analysis and the California Homeless Data Integration System. Agency Administrators will be asked to participate in additional calls in the months of October, November, and December in order to review data submitted as part of system-wide reporting.

COUNTY OF SAN LUIS OBISPO
DEPARTMENT OF SOCIAL SERVICES
HOMELESS SERVICES DIVISION

APPENDIX A: GLOSSARY OF TERMS

Term	Acronym	Definition
Coordinated Entry System	CE	CoC system used to identify persons experiencing homelessness, prioritize them for intervention, make referrals to housing projects, and monitor progress from homelessness to housing.
Continuum of Care	CoC	Federally-defined administrative entity that is composed of homeless serving organizations, administrators, and other stakeholders; charged with ending homelessness in their geographic jurisdiction.
CoC Data Systems	-	Term used in this document to refer collectively to the HMIS and DV Comparable, databases that are used to collect, store, and report on HMIS data elements for CoC purposes.
CoC Lead	-	Organization responsible for administering CoC operations; manages system-wide report submissions and the community's application for CoC funding. San Luis Obispo County is the CoC Lead.
Covered Homeless Organization	CHO	Any organization (including its employees, volunteers, affiliates, contractors, and associates) that records, uses or processes HMIS data elements for persons engaged by the CoC.
Data Quality	DQ	A measure of the validity and usefulness of data. Defined in this case as how accurately it

		portrays the conditions and operations of the CoC community.
Data Quality Improvement Plan	DQIP	Agreement between the CoC Lead and data-entering organization that establishes steps and benchmarks for data quality improvement for the data-entering organization.
Data Quality Management Plan	DQMP	The documented policies and procedures employed by a CoC to move toward its stated goals for data quality improvement and maintenance.
Department of Housing and Urban Development	HUD	Source of the majority of federal funding for CoC-participating organizations that establishes guidelines for HMIS data quality.
Domestic Violence	DV	Also called "inter-personal" or "intimate partner" violence, defined in this case as an experience of violence that qualifies a person for intervention from VAWA- and VOCA-funded entities.
DV HMIS Comparable Database	-	Database type required for DV-serving organizations (VSPs) funded by HUD as a substitute for participation in the CoC's HMIS.
Homeless Management Information System	HMIS	Database structure established by HUD for the collection of homeless services data. HUD-funded CHOs are required to participate in their CoC's HMIS, and the CoC is required to submit annual reports comprised of HMIS data elements.
HMIS Lead	-	CoC administrative entity charged with the operational management of the CoC's HMIS

		software. San Luis Obispo County is the HMIS Lead.
HMIS Participation	-	When A project collects all required data elements according to funder requirements and local CoC Policies and Procedures within the CoC's designated HMIS implementation, or that data is submitted to the CoC's designated HMIS implementation at least once a year to cover the whole year of required client data collected by the project.
Universal Data Elements	UDEs	HMIS data elements pertinent to clients and service interventions that are required across HMIS, regardless of funding type and that are generally applicable across project types.
Program-Specific Data Elements	PSDEs	HMIS data elements pertinent to clients and service interventions that are required by specific funding sources or for specific project type configurations.
Project Descriptor Data Elements	PDDEs	HMIS data elements that pertain to organization and project setup, essential for establishing the framework of service interventions for HMIS data collection and reporting.
Victim Service Provider	VSP	Term for a VAWA- or VOCA-funded organization who has at least one project that is dedicated to serving persons who have experienced DV.

APPENDIX B: HMIS DATA TYPES & CONVENTIONS

For the purposes of the DQMP, HMIS data elements are grouped into four types. Universal Data Elements (UDEs), Program Specific Data Elements (PSDEs), and Project Data Descriptor Elements (PDDEs), are designations derived from the HUD Data Dictionary. Administrative Data Elements reflect measures of data quality that are derived from data system metadata and calculated performance metrics rather than a discrete field in a database.

Project Data Descriptor Elements (PDDEs)

The Project Descriptor Data Elements (PDDEs) contain basic information about projects in CoC data systems. PDDEs are the 'building blocks' of these systems, enabling the following functions:

- Marking project data for inclusion or exclusion for federal reporting;
- Association of client-level records with the various projects in which clients will enroll in across project types;
- Definition of the type of project with which the client is associated the entire time they received housing or services;
- Identification of federal partner programs providing funding to the project; and
- Documentation of bed and unit inventory and other information relevant for federal reporting and strategic planning related to system capacity and utilization.

PDDEs are entered and managed by CoC data system administrators in collaboration with each Participating Agency. Data elements are entered at initial project setup by HMIS Lead staff and updated as changes occur to project or funding and are subject to annual review by data system administrators.

HUD requires that the CoC (typically via the data system Lead) collect project descriptor information for all continuum projects within its jurisdiction participating in CoC data systems by collecting and entering client-level HMIS data elements as well as all residential continuum projects, regardless of their participation in CoC data systems. If the databases include client and service data entered by non-continuum projects (e.g., food pantries or other services that might be used by people who are not experiencing homelessness), the continuum must identify them as such using the PDDEs to ensure that data are excluded from required reporting on continuum projects.

Universal Data Elements (UDEs)

The Universal Data Elements (UDEs) establish the minimum data collection requirements for all CHO projects entering data into CoC data systems, regardless of funding source. The Personally Identifiable Information (PII) and UDEs (3.01 through 3.07) must be collected once per client, regardless of how many project stays that client has in the system. The remaining UDEs (3.08 through 3.917) are to be collected at least once per project stay.

Program Specific Data Elements (PSDEs)

The Program Specific Data Elements (PSDEs) have been designed by HUD to allow projects that receive funding from any HMIS Federal partners. As such, requirements to collect specific PSDE's vary based on funding source and project type. The HUD Exchange Federal Partners landing page serves a gateway to the manuals that provide the specific PSDE data collection requirements per program and project type.

PSDEs, as defined by HUD, provide additional information about the characteristics of clients, the services they are provided, and program outcomes. Many of these data elements represent repeated transactions and were designed to collect information that may change over time. The "Common Program Specific Data Elements," which are the PSDEs that are collected across most Federal
Partner programs, are presented in the table below.

APPENDIX C: DATA QUALITY IMPROVEMENT PLAN

The HMIS Lead will conduct routine data quality monitoring on a monthly basis, as described in the Data Quality Management Plan. In-depth review will be conducted on a rotating basis with each Agency no less than every other year. Agencies will be notified in advance when they are selected for an in-depth review. Agencies that do not meet the CoC Data Quality metrics, may be asked to complete a Data Quality Improvement Plan. Below is the process the HMIS Lead staff will follow to assist an agency in meeting the CoC's Data Quality goals. The Improvement Plan will follow a 3-month timeline aimed at providing opportunities for quality improvement and tailored training to meet agency and end-user needs. Plans can focus on a single project type or multiple project types in an agency, depending on the extent of improvement needed and resource availability.

Preliminary analysis will be initiated with **Table 1** below. It will contain error rates found on the HUD Data Quality Report in HMIS for the 12 months preceding the Improvement Plan. Cells will be highlighted in red, representing data points beyond the maximum error limit. Additional detail will be provided on potential sources of the errors and corrections necessary.

Error Rate (Max)	Data Type	CE	ES EE	ES NBN	HP	PSH, OPH	RRH	SO	TH
5%	**Personally Identifiable Information**								
	Name								
	Social Security Number								
	Date of Birth								
	Race and Ethnicity								
	Gender								
5%	**Universal Data Elements**								

	Veteran Status								
	Project Entry Date								
	Relationship to HoH								
	Client Location								
	Disabling Condition								
5%	**Income and Housing Data Quality**								
	Destination								
	Income and Sources at Start								
	Income and Sources at Annual Assessment								
	Income and Sources at Exit								
5%	**Chronic Homelessness**								
	ES, SH, Street Outreach								
	TH								
	PH								
	CE								
	SSO, Day Shelter, HP								
5%	**Timeliness**								
	Project Entry Records beyond 72 operating hours								
	Project Exit Records beyond 72 operating hours								

Table 1: A snapshot of the Participating Agency’s data quality over the previous 12 months

COUNTY OF SAN LUIS OBISPO
DEPARTMENT OF SOCIAL SERVICES
HOMELESS SERVICES DIVISION

Outline

If a Data Quality Improvement Plan is determined to be necessary, the HMIS Lead will follow the process below to identify areas for improvement and needed training. The HMIS Lead will determine these in partnership with the Participating Agency by forming a Data Quality Committee for the duration of the project. At the conclusion of the project, the Committee will determine if there has been sufficient improvement to conclude with a Final Report or to continue the effort. The Final Report will include action taken, error rates throughout the project, and feedback from the Participating Agency to the HMIS Lead.

Task ID	Task List	Community Task Lead	Target Date	Completion Date
1	**Month 1 Goal: Assess Baseline of Compliance**			
	Provide initial findings to the Agency Administrators and Agency Leadership	HMIS Lead		
	Agency staff identified to form a Data Quality Committee	HMIS Participating Agency		
	Begin correcting data in system for previous month (Month 0)	HMIS Participating Agency		
	Assess Training Needs and present Training Schedule/Plan	HMIS Lead		
2	**Month 2 Goal: Implement Training and Support**			
	Data Quality Reports for Months 0 and 1 Reviewed by DQ committee	DQ Committee Members		

	Correct Data in system for Month 1 and Month 0 as necessary	HMIS Participating Agency		
	Training Conducted	HMIS Lead		

3	**Month 3 Goal: Follow-Up Assessment**			
	Data Quality Reports for Months 0, 1 and 2 Reviewed by DQ committee	DQ Committee Members		
	Correct Data in system for Months 0, 1, and 2 as necessary	HMIS Participating Agency		
	Complete Training Plan	HMIS Lead		
	Determine Need to Continue or Conclude Improvement Process	DQ Committee Members		
	Create Final Report of the Improvement Process	HMIS Lead		

From:	Mark Frauenheim
To:	Laurel Weir
Cc:	Jeffrey Al-Mashat; Kate Bourne
Subject:	[EXT]Comments on draft HMIS data quality management plan
Date:	Monday, June 8, 2026 6:42:03 PM

Laurel,

I spent some time reviewing the HMIS data quality management plan as requested at the last meeting. In general, there is an opportunity for the document to be simplified and, with some rearranging, provide a more succinct set of actions for the target audience - the COCs.

Comments

1. Consider rewriting and simplifying the introduction to emphasize that data quality of HMIS (and comparable databases) is important because it serves as the primary system of record for all State and Federally funded projects. If the data is poor, two important things can happen: your funding may be jeopardized and your/our help provided to the client could be impacted. Stress why data quality is important so the reader gets it.
2. Consider moving the "HMIS Data Types and Conventions" to an Appendix.
3. Move the Standards for Client, Enrollment, and Assessment data to right after the Intro. This is the meat and potatoes of the document and should be near the front. Supporting information can be after or in an appendix.
4. Timeliness - can this be simplified to one business day or no later than the next business day after the event? "72 business hours" can be interpreted many ways such as up to nine days for a routine 8 hour work day. Consider stating that the timeliness goal is same day but by the end of the next business day at the latest.
5. Part of any quality plan is to address training. This seems to be under "consistency" so perhaps reword this to training requirements: initial, refresher, consistent use.
6. Consider adding a communication section that would include periodic helpful instructions, user tips and tricks, recognition for exceptional performers, etc. The HMIS lead would be the owner.
7. Require that each COC develop some form of internal quality control (QC) to ensure high data quality. This can be super simple but simply having it indicates data it's important.
8. The HMIS lead should perform the quality assurance (QA) function through the

actions listed. Consider noting in this section that the combined QC/QA actions between the COCs and County staff help ensure high data quality.

9. In Appendix A it states that Agencies that do not meet the quality metrics may be asked to complete a data quality improvement plan. Consider revising that to require 1) Determine the cause of the poor quality, 2) develop action(s) to address the cause, 3) keep it simple.

I'd be glad to meet and discuss if needed before or after the meeting next week.

Best regards,

Mark Frauenheim

San Luis Obispo County HMIS Policies & Procedures

Continuum of Care:
CA-614 San Luis Obispo County

HMIS Lead Agency:
County of San Luis Obispo
Department of Social Services
PO Box 8119
San Luis Obispo, CA 93403
Telephone: (805) 781-1600

Contents

1. Revision History

These Policies and Procedures shall be reviewed and, if necessary, revised at least annually by the Continuum of Care. See Section 6.10 for Policies and Procedures related to changes of this and other documents.

Date	Author	Description
11/27/2012	County of San Luis Obispo Department of Planning and Building	Full revision referencing all HUD standards and 2011 HEARTH HMIS Proposed Rule
1/6/2014	County of San Luis Obispo Department of Planning and Building	Revisions referencing designations
10/27/2016	County of San Luis Obispo Department of Planning and Building	General revisions
7/21/2021	County of San Luis Obispo Department of Social Services	General revisions and updates
08/22/2023	County of San Luis Obispo Department of Social Services	Formatting update and revisions to reflect the FY 2024 HUD Data Standards
1/9/2024	County of San Luis Obispo Department of Social Services And the Institute for Community Alliances (ICA)	Revisions to reflect the migration and functionality in BitFocus Clarity Human Services
12/13/2024	County of San Luis Obispo Department of Social Services, ICA, and HSOC Data & Performance Committee	Revisions to update Roles and Responsibilities, Grievance Policy, Posted Notice, and Data Quality Management Plan
09/16/2026	County of San Luis Obispo Department of Social Services, ICA, and HSOC Data & Performance Committee	Revisions to reflect updates to Data Quality Management Plan

2. Introduction

The Homeless Management Information System (HMIS) is a longitudinal database to assist in the service of homeless populations throughout the United States. It is designated by a local Continuum of Care (CoC) to comply with the requirements of the CoC Program Interim Rule 24 CFR 578. The San Luis Obispo Continuum of Care (CoC) has implemented this system since 2010. It has undergone several instances of change since the initial implementation. With this version of Policies and Procedures the Homeless Services Division, within the Department of Social Services, hopes to see further expansion of participating agencies and streamlined delivery of Homeless Services. The Homeless Services Division and HMIS Lead staff continue their effort with partner agencies to grow and improve the system in support of clients and their housing needs.

HMIS Data and Technical Standards Final Notice, published by HUD in July 2004, and revised in March 2010. As described in the March 2010 HMIS Data Standards Revised Notice, an HMIS is an electronic data collection system that stores longitudinal person-level information about persons who access the Homeless Services system in a Continuum of Care. HMIS is a valuable resource because of its capacity to integrate and de-duplicate data from all homeless assistance and homeless prevention programs in a Continuum of Care.
Aggregate HMIS data can be used to understand the size, characteristics and needs of the homeless population at the local, state, and national levels.

The following HUD HMIS Standards were referenced in the creation of this document:

- 2004 HMIS Data and Technical Standards Final Notice
- Guidance on HPRP Subgrantee Data Collection and Reporting for Victim Service Providers
- 2010 HMIS Data Standards Revised Notice
- 2011 HMIS Requirements Proposed Rule

HMIS is used by the federal partners and their respective programs in the effort to end Homelessness, which includes:

- US Department of Health and Human Services (HHS)
- US Department of Housing and Urban Development (HUD)
- US Department of Veterans Affairs (VA)
- Housing Opportunities for Persons with HIV/AIDS (HOPWA)

Partners with funding from the State of California may be required to participate in HMIS under Title 42. Programs with other sources of funding are not required to participate in the HMIS, but they are strongly encouraged to participate to contribute to a more comprehensive understanding of homelessness in the region.

Comparable databases are required for use by providers of services for survivors of domestic violence, as described in the Violence Against Women Act (VAWA). It is the San Luis Obispo County CoC HMIS Lead's responsibility to ensure the compliance of comparable databases. Other federal and state partners also require HMIS participation for grantees and subrecipients.

The HMIS and its operating policies and procedures are structured to comply with the most recently released HMIS Data Standards. Recognizing that other Federal, State, and local laws may further regulate agencies, the San Luis Obispo County CoC may negotiate its procedures and/or execute appropriate business agreements with Partner Agencies so they are in compliance with applicable laws.

3. Governing Principles

Described below are the overall governing principles upon which all decisions pertaining to HMIS are based. Participants are expected to read, understand, and adhere to the spirit of these principles.

3.1 Confidentiality

Policies regarding client data are founded on the premise that a client owns his/her personal information. Everyone will have the right to grant informed consent, limit data sharing, or revoke consent related to his/her PPI at any time. Policies are in place to protect client, agency, and the SLO County CoC's interests. Collection, access and disclosure of client data through HMIS will only be permitted by the procedures set forth in this document.

The protection of clients' rights and privileges is crucial to the successful operation of HMIS. These policies and procedures are intended to ensure clients' privacy without impacting the delivery of services. Security and confidentiality will be prioritized by System Administrators and End Users at all times.

3.2 Data Quality

All End Users will strive for the highest possible degree of data quality. Complete and accurate data recording will help improve service coordination and data-driven decision making.

3.3 System Availability

The availability of a centralized data repository is necessary to achieve an aggregation of unduplicated homelessness statistics. The San Luis Obispo County CoC will strive for broad deployment and availability of the HMIS by human service agencies that adopt the aforementioned governing principles.

4. Roles and Responsibilities

4.1 Homeless Services Oversight Council

The Continuum of Care, through its Governing Board the Homeless Services Oversight Council (HSOC) is responsible for the governance of the San Luis Obispo HMIS. In all HMIS governance decisions, the Continuum of Care will balance the interests and needs of all HMIS stakeholders, including clients, service providers, and policy makers. Through this role it will provide the following:

• Oversight to the HMIS Lead • Approval of HMIS policy forms and documentation • Ensure Agency participation and feedback	• Approve and facilitate HMIS Funding • Compliance with HMIS Policies & Procedures

4.2 HMIS Lead Agency

The San Luis Obispo Department of Social Services (DSS) will serve as the HMIS Lead Agency, known informally and interchangeably as HMIS Lead or HMIS Lead Agency. The HMIS Lead Agency provides day-to-day management of system participation, operations, and security. Through this role, DSS staff will be the primary contact for both HUD and the HMIS vendor. HMIS lead staff will bring in additional subcontractors to fulfill these tasks as necessary. In addition, they will be responsible for the following:

• Negotiate software vendor contracts • Evaluate potential Partner Agencies for HMIS Participation • Ensure Compliance with HMIS Policies & Procedures • Authorized agent for Agency Participation Agreements • Creation of Project forms and documents • Maintain up to date information on the HMIS website • Monitoring end user licenses • Point of contact with software vendor • Add & Remove user rights • Develop and administer training curriculum • Ensure documentation of training	• Provide confidentiality training • Provide initial software training for Agency Administrators and end users • Provide end user support • Review security of Participating Agencies via site visits • Monitor data quality and timeliness • Assure vendor adherence to HMIS Data and Technical Standards • Application Customization • Aggregate data reporting and extraction per agency needs • Assist Partner Agencies with agency-specific data collection and reporting needs • Manage User licenses

4.3 HMIS Participating Agency

Agencies that wish to access the San Luis Obispo HMIS to enter and/or view client data become HMIS Participating Agencies through executing an Agreement with the County of San Luis Obispo. To ensure the protection of client privacy and adherence to local, State, and Federal laws, Agency access to HMIS is not guaranteed. Agencies with CoC or other funding sources requiring HMIS use will be prioritized first. Each Participating Agency Agreement specifies that the entity agrees to uphold these Policies and Procedures. Representatives from HMIS Partner Agency are responsible for the actions of the HMIS End Users within their agency workgroups. Agreements also specify that Participating Agencies will do the following:

• Designates 1-2 Agency Administrators • Notify HMIS Lead Agency of departure of any HMIS user, before or on the date of their departure in order to maintain site security and client confidentiality • Designate individual for Agency Technical support • Monitor Agency compliance with Policies & Procedures • Hold executed Client Informed Consent forms • Serve as Authorizing Agent for user ID requests • Ensure compliance with HMIS Policies & Procedures	• Ensure data quality and timeliness • Ensure data is corrected on monthly data quality reports or per request of HMIS Lead • Attend monthly HSOC Finance and Data Committee meetings • Monitor security of staff workstations • Maintain their agency's internet connectivity • Ensure virus protection and spyware detecting software is installed on all computers that access HMIS and ensure a virus scan is run at least once a week • Run data integrity reports, run down discrepancies and make corrections

4.4 HMIS Agency Administrator

An Agency Administrator is designated for each Participating Agency in HMIS to be a primary point of contact between the HMIS Lead staff and the rest of the Participating Agency. Agencies with a large number of users and/or clients may request additional Agency Administrator licenses from the HMIS Lead. Agency Administrators are expected to be in a supervisory or leadership role in their organization and have a high level of comfort in navigating business software. These users will have additional permissions and visibility within the system to run detailed and ad hoc reports reflecting the projects their agency administers. Other responsibilities are listed below:

- Serves as main point of contact between HMIS Lead and Partner Agency
- Enrolls HMIS users in New User Training
- Submits new HMIS project requests to the HMIS Lead staff with new funding sources or contracts
- Ensures that Agency is represented at HMIS Office Hours or other HMIS forums on a regular basis
- Serves as first level in evaluating and addressing any HMIS data entry questions

4.5 HMIS End User

An HMIS End User is an individual designated by the Partner Agency to enter, view, or contribute client Protected Personal Information (PPI) in the San Luis Obispo HMIS on behalf of the Partner Agency. All HMIS End Users are required to complete training assigned by the HMIS Lead Agency, adhere to all End User responsibilities outlined in the HMIS Policies and Procedures, and sign the San Luis Obispo HMIS End User Agreement.

All HMIS End Users are required to read and comply with the most recent HMIS Data Standards Manual. Failure to comply with the HUD standards warrants the same consequences as failure to comply with SLO CoC HMIS Policies and Procedures. In any instance where these Policies and Procedures are not consistent with the HUD Standards, the HUD Standards take precedence. Should any inconsistencies be identified, the end user and Partner Agency are expected to immediately notify the HMIS Lead Agency.

• Sign HMIS End User Agreement • Attend and participate in HMIS training provided by the County of San Luis Obispo • Safeguard client privacy through compliance with confidentiality policies	• Collect data as specified in end user training and as directed in compliance with the HMIS Policies and Procedures • Enter data within 3 business days of program entry or exit • Adhere to the HMIS Policies & Procedures

5. HMIS Operations

5.1 Agency Participation

Agencies participating in HMIS shall commit to abide by the governing principles of HMIS and adhere to the terms and conditions of this partnership as detailed in the HMIS Participating Agency Agreement.

Participating agencies must have a signed HMIS Participating Agency Agreement prior to project set up, entry of client data or requesting HMIS end users. This document allows agencies to specify if they would like their client data shared with other agencies in the database. Data sharing is encouraged, with appropriate client consent, to help facilitate referral of services between agencies. This will also help reduce the number of duplicate entries. New Agencies interested in participating in HMIS must enter into an HMIS Participating Agency Agreement, which the HMIS Lead Agency reserves the right to approve, deny, or seek additional information thereof. Upon receipt of an executed Agency Agreement, HMIS Lead staff will begin the New Project Set- Up and New User processes detailed below. Once a new agency is granted access to HMIS by the HMIS Lead, the new agency will be added to the list of participating agencies posted to the HMIS website.

Assign Participating Agency Administrator

Each Partner Agency shall designate a primary contact for communications regarding HMIS. This individual will receive regular updates regarding any changes in HMIS and monthly Data Quality reports. They will be expected to respond to any direct inquiries on data quality issues and assist in overall compliance and training new users at their agency. For Partner Agencies that do not designate an HMI Agency Administrator, the HMIS Lead reserves the right to assign one.

Minimum Participation Standards

HMIS partner agencies and users that enter data into HMIS directly must collect all Universal Data Elements, as defined by HUD, for clients receiving services in programs participating in the San Luis Obispo County HMIS. Additionally, all participating agencies are responsible for ensuring that Common Program Specific Data Elements, as defined by the HMIS Data Standards, are collected from all clients that are served by applicable HUD funded programs.

Other optional data elements may also be required for certain programs or Coordinated Entry. Any optional or custom data elements will be developed in partnership with stakeholders and approved by the Homeless Services Oversight Council (HSOC).

5.2 New Project Set-Up, Project Closures and Project Changes

Participating agencies in HMIS are expected to submit a New Project Request Form for all new projects within the HUD recommended timeframe of 90 days prior to serving clients or spending funds specific to HMIS compliance. Agencies must be in compliance with and have a current Agency Agreement with HMIS LEAD to submit new projects. The New Project Form can be retrieved online at the HMIS Knowledge Base website, https://slocounty.helpscoutdocs.com/ or by emailing the HMIS Support inbox. It is the responsibility of the HMIS participating agency to ensure projects are set up correctly and timely. Projects entered into HMIS, unless specifically determined otherwise, are subject to the San Luis Obispo CoC HMIS Data Quality Management Plan.

HMIS Agency Administrators are responsible for informing HMIS Lead staff when a project is no longer serving clients. The HMIS Lead will deactivate the project in HMIS so no new enrollments can be added to the project. Data from deactivated projects will remain available in HMIS for 7 years per HUD requirements. Agency Administrators interested in requesting changes to current projects in HMIS must reach out directly to the HMIS Lead by emailing the HMIS Support inbox at: ss_hmissupport@co.slo.ca.us, or an otherwise determined support ticket process.

5.3 New User Enrollment

Any agency that is a provider of homeless services to clients in San Luis Obispo County is encouraged to participate in contributing data to HMIS. Participation may be required depending on funding source. The HMIS Lead will determine if there are available user licenses. New users will only be enrolled in HMIS after an HMIS Participating Agency Agreement is in place.

Detailed New User Enrollment Process can be found at the HMIS Knowledge Base at slocounty.helpscoutdocs.com. New users must be enrolled in training by an Agency Administrator. It is the responsibility of the Agency Administrators and individual users to ensure timely and accurate completion of HMIS End User Training as outlined in the HMIS Knowledge Base and the training website.

User access is agency and project specific and at the discretion of the HMIS Lead Agency. User access level will be determined based on the information provided in the “Sign Up” section of the HMIS training website.

User IDs are individual and passwords are confidential. No individual should ever use or allow use of a User ID that is not assigned to that individual, and user-specified passwords should never be shared or communicated in any format.

HMIS partner agencies must notify HMIS Lead and Homeless Services staff of relevant personnel changes. Additional details regarding change of user status can be found in the section for Deactivating Accounts below.

5.4 Security

Assessment

For new agencies accessing HMIS, the Partner Agency's Administrator(s) will meet with Homeless Services staff to review and assess the security measures in place. They will assess agency information security protocols. This review shall in no way reduce the responsibility for agency information security, which is the full and complete responsibility of the Partner Agency and its staff.

Annual Security Audit

Existing HMIS Participating Agencies may be subject to additional security assessments during Annual HMIS Project Monitoring. Site visits will be held to confirm security at participating HMIS Partner Agencies during this monitoring. Agencies will be notified in advance of any site visit

Workstation Security

Each HMIS user is required to utilize the following at their workstation:

- Anti-spyware software and virus protection properly installed
- A full-system scan has been performed within the last week
- Each workstation has and uses a hardware or software firewall
- Screens that "go to sleep" after 5 minutes of inactivity and require a password to re-activate
- Screens positioned or equipped so that data is not visible to others
- Does not have usernames and/or passwords posted in visible locations

Prior to access, Partner Agencies will confirm that any workstation accessing HMIS has and uses a hardware or software firewall and that anti-virus software performs frequent full-system scans.

Unencrypted PPI may not be stored or transmitted in any fashion—including sending file attachments by email or downloading reports including PPI to a flash drive, to the End User's desktop or to an agency shared drive. All downloaded files containing PPI must be deleted from the workstation temporary files and the "Recycle Bin" emptied before the End User leaves the workstation.

Access Rights

Access to the HMIS will only be approved for those staff members that require access for business purposes only. The user's access rights will be determined by the Partner Agency Administrator and the HMIS Lead.

If a user changes roles within a Partner Agency or needs to access new Projects within HMIS, the Partner Agency Administrator should contact Homeless Services staff to modify those permissions. It is important that the Partner Agency Administrator notifies the HMIS Lead of these changes as soon as possible so that rights can be added and removed as appropriate. Further details for Agency Administrators regarding removing access, personnel changes, and consequences for data breach found in the Deactivating Accounts section.

Password and User ID Assignment

Upon completion of training and signing the User Agreement, the user will be assigned a unique ID and password to access the rights assigned that user within the HMIS. Users should not allow anyone else use of their assigned unique user ID. A user should never use an ID that is not assigned to them nor should passwords be shared and or communicated in any format. To do so is considered a breach of security and users may have their HMIS access revoked at the discretion of the HMIS Lead.

Changing Passwords

When the user logs onto the system for the first time they will be prompted to change their password to a password only they know. Passwords must consist of at least 8 characters, a combination of at least one upper case letter, at least one lower case letter, and at least one special character.

Passwords must be changed every 90 days. If they are not changed within that time period, they will expire and the user will be locked out of the system. Three consecutive unsuccessful attempts to login will disable the User ID until the HMIS Lead or Partner Agency Administrator reactivates the account.

In the event a user's password has expired, or the user forgets their password, users may use the "Forgot Password" feature on the website to reset their password. If a user still cannot access the site, they should contact Homeless Services staff at ss_hmissupport@co.slo.ca.us for assistance.

Deactivating Accounts

It is important that a user account be deactivated in the system when they leave the agency or otherwise becomes inactive. It is a breach of security to have unused user accounts active. It is the responsibility of the Partner Agency Administrator to notify the HMIS Lead within two (2) business days if a staff member leaves the Agency. In the event that HMIS account access Is not revoked for any reason, the former HMIS user is required to act with integrity and not attempt to access HMIS if their job duties no longer include HMIS or if they leave their HMIS participating agency.

Access may be immediately rescinded when any HMIS user is suspected of breaching the Participating Agency User Agreement, violating the Policies & Procedures, or breaching confidentiality or security, while an investigation by the HMIS Lead and the partner agency is conducted. If the user is found to have breached or violated the above, and the partner agency does not otherwise permanently inactivate the user from the system (termination of employment, reassignment of duties) the HMIS Lead has the right to permanently inactivate the account thereby denying access to the system for that user.

Data Breach

A data breach is the unauthorized access or acquisition of data that compromises the security, confidentiality, or integrity of data in HMIS. Data may be in any format (electronic, hard copy or verbal) and may consist of a single piece of data and/or an entire data system. Breaches to the HMIS servers are managed by the HMIS vendor. If a breach to the HMIS servers occurs, the HMIS vendor will notify the HMIS Lead, and the CoC. Should a data breach occur through a Partner Agency, the partner agency is required to notify the HMIS Lead immediately. The HMIS Lead and CoC reserve the right to revoke access to HMIS to any individual or Partner Agency because of a data breach. Additionally, HIPAA covered entities and their business associates are required to provide notification of a breach to the affected individuals, the US Secretary of Health and Human Services, and in some instances the media per the HIPAA Breach Notification Rule, 45 CFR Section 164.

5.5 Collection and Entry of Client Data

Each participating agency is responsible for their clients' data. Participating agencies must obtain informed consent prior to sharing any client protected identifiable information (PII) in the San Luis Obispo HMIS. These policies and procedures are intended to provide the minimum level of consent and accompanying documentation. Participating agencies may develop more stringent policies to fit their organizational needs.

For agencies or programs where HIPAA applies, HIPAA requirements take precedence over both the HUD HMIS Data Requirements (as specified in those requirements) and these Policies and Procedures. Agencies and programs are responsible for ensuring HIPAA compliance.

Victim service providers that are recipients of funds requiring participation in HMIS do not directly enter data into an HMIS but must use a comparable database in compliance with the latest HUD

HMIS Data Standards. A comparable database allows the collection of the aggregate data needed for reporting while respecting the sensitive nature of the client-level information if it complies with all HMIS data technical, and security standards. Legal service providers may also use a comparable database if allowed by the funder and said database complies with all applicable standards.

HMIS Participating Agencies will be given access to view, enter or otherwise modify data in HMIS depending on the terms of their Agency Agreement. Some data may be restricted and not visible to all participating Agencies based on sensitive nature of the information or a client's right to request their data not be shared. Agencies receiving funding that requires HMIS but who have additional privacy restrictions including domestic violence shelters, law enforcement agencies or some healthcare agencies may enter data through data exchange but will not have direct HMIS access. Data entry via an existing Partner Agency may be allowable with the prior approval of the HMIS Lead.

The HMIS Lead Agency reserves the right to remove HMIS Access if the access is not being used to improve service provision for clients or contributing meaningful data to the CoC. Examples of unacceptable uses of HMIS include but are not limited to:

a) Using HMIS data to monitor the whereabouts or service utilization of participants for purposes outside of housing-focused case management
b) Using HMIS data outside of a business need
c) Using data in HMIS as a reason to not serve a client that is not related to eligibility criteria (i.e. substance use history, mental health issues, etc.)
d) Sharing client identifying data with persons or groups that don't have access HMIS

Client Informed Consent and Confidentiality

Client Data will only be shared with Partner Agencies if the Client consents, has signed the Release of Information Authorization (Appendix II), and the signed Informed Consent & Release of Information Authorization is available on record. All Universal and Common Program Specific Data Elements from the current HMIS Data Standards should be collected, subject to client consent.
Additional data may also be collected to support other programs. Client confidentiality is further detailed in the HMIS Privacy Notice (Appendix I).

Client Enrollment Data (Entry, Assessment and Exit Data)

Client program entry and exit dates should be recorded for all program participants. Entry dates should record the first day of services or program entry with a new program entry date for each period/episode of services. Exit dates should record the last day of residence in a program's housing before the participant leaves the shelter/housing or the last day a service was provided in a program. Add bed night citation.

Data Timeliness

Per the San Luis Obispo County CoC HMIS Data Quality Management Plan, HMIS data must be entered into HMIS in real time or within three (3) business days from the point of the event (intake/enrollment, service delivery, annual assessments, or exit/discharge).

Data Quality Plan

A Data Quality plan is a systematic approach for the CoC to establish and define data quality expectations. Data quality is a key component for HUD reporting purposes such as the System Performance Measures (SPM), Longitudinal Systems Analysis Report (LSA), Annual Performance

Report (APR), Point-In-Time (PIT) Count and Housing Inventory Count (HIC), as well as reporting purposes for federal and state partners. In addition, HUD ties data quality to overall CoC competitiveness for funding.

In order to qualify as "participating in the HMIS," all HMIS Participating Agencies must meet the data quality benchmarks as described in the San Luis Obispo County CoC HMIS Data Quality Management Plan. These benchmarks apply to all HMIS Participating Agencies, whether or not the agency provides the data directly into the HMIS or submits it to the HMIS Lead Agency for input into HMIS, including the following mandated projects: HUD Continuum of Care (HUD CoC) & Emergency Solutions Grant (ESG), US Department of Veterans Affairs Supportive Services for Veterans Families (VA SSVF), and US Department of Health and Human Services Runaway and Homeless Youth (HHS RHY) Substance Abuse and Mental Health Services Administration Projects for Assistance in Transition from Homelessness (SAMHSA PATH).

Data Quality Monitoring

The HMIS Lead will perform monthly data integrity checks on the HMIS data, which will include the following steps:

- Run latest version of the HUD Eva Data Quality Tool
- Notify Partner Agency Administrator of findings and timelines for correction;
- Re-run reports for errant agencies/programs, as requested. Follow up with Partner Agency Administrators if necessary;
- Notify Agency Executive Director if Partner Agency Administrators are not responsive to required corrective actions; and
- Notify HSOC Data & Performance Committee regarding any uncorrected data quality issues.

5.6 Release and Disclosure of Client Data

Client-specific data from HMIS may be shared with Partner Agencies only when the sharing agency has secured informed consent authorizing such sharing, as demonstrated by a signed HMIS Release of Information (ROI) Authorization form, and only during such time that Client Informed Consent and Release of Information Authorization is valid (before its expiration). Other non- HMIS inter-agency agreements do not cover the sharing of HMIS data. Sharing of client data may be limited by program specific confidentiality rules.

The HMIS Release of Information Authorization (ROI) must constitute informed consent. The burden rests with the Partner Agency End User or intake counselor to inform the client about the purpose and function of HMIS data before asking for consent. As part of informed consent, a Privacy Posted Notice must be posted in the intake area explaining the reasons for collecting the data, the client's rights regarding data collection, and any potential future uses of the data. An example of such a sign may be found on the HMIS website.

Participating Agency End Users must obtain a new signed ROI and enter it into HMIS if the client's original release has expired. ROIs can be signed by the client electronically in the HMIS user interface, or may be uploaded to the client profile.

No client-specific data will be released or shared outside of the Partner Agencies unless the client gives specific written permission or unless withholding that information would be illegal. Note that services may NOT be denied if client refuses to sign Release of Information Authorization or declines to state any information. Requests by any law enforcement agency, including State or Federal agencies, for information contained in HMIS must be directed to the HMIS Lead. This escalation must take place prior to sharing any client or programmatic information. These requests will be reviewed in accordance to San Luis Obispo County Department of Social Services policy. Notice and consultation will be given to agencies with shared clients. Regulation specific to law enforcement and legal data sharing is provided in the section for Collection and Entry of Client Data.

Aggregate data that does not contain any client-specific identifying data may be shared with internal and external agents without specific permission. This policy should be made clear to clients.

HMIS Privacy Posted Notice

HUD's HMIS Privacy and Security Standards specify the guidelines for the privacy and security of personal information collected and stored in an HMIS. The standards require each covered HMIS Participating Agency to publish a HMIS Privacy Posted Notice. The standards establish baseline privacy requirements for the HMIS Participating Agencies. A HMIS Participating Agency must post a sign at each intake desk (or comparable location) that explains generally the reasons for collecting this information. Consent of the individual for data collection may be inferred from the circumstances of the collection.

HMIS Privacy Notice

The HMIS Privacy Notice applies to all San Luis Obispo County CoC HMIS Participating Providers and addresses how information about clients may be used and disclosed at Providers as well as client rights over their information. The HMIS Privacy Notice may be amended at any time, and amendments may affect information obtained before the date of the amendment. The agency will provide copies of the privacy notice to any client upon request. The agency should also include a copy of the HMIS Privacy Notice on their organization website.

Clients' Rights to Data

A client shall have the right to receive a copy of HMIS data relating to their individual profile upon request.

Grievance Policy

Per the SLO County HMIS Privacy Notice, the client has the right to ask questions of, or submit grievances to, the provider regarding privacy and security policies and procedures.

The HMIS Grievance Form will be used for clients who feel their privacy rights have been violated by an HMIS Participating Agency. The form is to only be used after the client has worked with the agency to resolve an HMIS issue.
The client will submit the form to the HMIS Lead and will be reviewed by the HSOC Finance and Data Committee to recommend resolution between client and agency.

5.7 Reporting

Reporting for Funders

All standard HUD reports can be found in the Report Library in Clarity Human Services. Additionally, some users will have access to the Data Analysis feature in Clarity, that holds dashboards with more detailed information. These dashboards can be customized by emailing the help desk.

Custom reporting done on a regular cadence can be built into Clarity by submitting a request to the help desk. This will ideally be done before the project starts, so that data collection and reporting align. It is the responsibility of the Agency to inform the HMIS Lead of any report needs.

Funders may also request information for monitoring. These requests should be pre-determined whenever possible. The agency or agencies whose activities are being monitored must be informed, and the HMIS Lead must receive the request at least 10 days prior to the date when the report is needed.

5.8 Training

HMIS Orientation

All users accessing HMIS must first complete the San Luis Obispo CoC HMIS training. Training includes videos, written material, and quizzes located on the Homeless Services training website. The CoC and HMIS Lead Agency reserve the right to improve and innovate training procedures so long as reasonable and ample notice is provided for HMIS Partner Agencies and end users. Users will receive a link to access this site once they have been enrolled by an Agency Administrator as described in the New User Enrollment section of this document.

Training for privacy and security measures will occur annually, and all participating agencies and users must participate. Additionally, users must attest to their knowledge and application of the privacy and security measures.

Live Training

The Partner Agency Administrator will coordinate with the HMIS Lead to schedule any additional live trainings with the HMIS vendor and/or Homeless Services Staff. Live, virtual training will also be coordinated for any HUD Data Standard updates or other system changes. All users will be expected to attend these trainings or view a recording if one is made available.

Technical support includes issue reporting, requests for enhancements (features), or other HMIS-related requests. The HMIS Lead will only provide support for issues specific to the HMIS software and systems, not for technical support of hardware being used by HMIS users.

Request for Support

End Users should submit support requests to their Partner Agency HMIS Administrator, who may escalate the request to the HMIS Lead Agency, who may in turn escalate the request to the HMIS software vendor as appropriate. Under no circumstances should End Users submit support requests directly to the HMIS software vendor.

The user should evaluate the immediacy of the issue. If the user needs immediate resolution of the issue because the issue is hindering the user from being able to enter the data into the system, the user should contact the HMIS Lead at ss_hmissupport@co.slo.ca.us. When submitting a request to the HMIS Support inbox, only one issue should be contained per email. This will allow Support staff to more efficiently assign or escalate items.

Most common emergent issues are a forgotten password, a password that is not working, or the user is trying to access the system from a computer that an individual has not accessed the system from before. Forgotten passwords can be resolved using the “Forgot Password” button on the software landing screen.

HMIS Office Hours

HMIS End Users and Agency Administrators are encouraged to attend monthly HMIS Office Hours. These will be held virtually and will be an opportunity for users to bring questions or concerns to the HMIS Lead. Calendar invitations will be sent to new and existing users through the ss_hmissupport email.

6. Changes to Policies and Procedures and Other Governance Documents

Revisions

The HMIS Lead will seek approval for revisions of all HMIS documents in consultation with the HSOC Data & Performance Committee. Final approval will be granted by a vote at the Full HSOC Committee.

Distribution

A copy of the revised Policies and Procedures document will be distributed to the partner agencies and posted publicly to the DSS website. Partner Agencies will be asked to sign a receipt acknowledging they have received the revised Policies and Procedures. It is the agency's responsibility to make sure everyone participating in the HMIS has access to a copy of the document, reads it, understands it, and agrees to comply with it.

7. Other Obligations and Agreements

The San Luis Obispo County CoC will decide funding responsibilities for additional licenses as the needs arise. While it may not be possible to meet every Partner Agency's request for End User licenses with the existing funding, the HMIS Lead Agency, in partnership with the Continuum of Care will endeavor to ensure that every Partner Agency will have its minimum requirements met.

Appendix I- Glossary of Terms

Term	Acronym	Definition
Coordinated Entry System	CE	CoC system used to identify persons experiencing homelessness, prioritize them for intervention, make referrals to housing projects, and monitor progress from homelessness to housing.
Continuum of Care	CoC	Federally-defined administrative entity that is composed of homeless serving organizations, administrators, and other stakeholders; charged with ending homelessness in their geographic jurisdiction.
CoC Data Systems	-	Term used in this document to refer collectively to the HMIS and DV Comparable, databases that are used to collect, store, and report on HMIS data elements for CoC purposes.
CoC Lead	-	Organization responsible for administering CoC operations; manages system-wide report submissions and the community's application for CoC funding. San Luis Obispo County is the CoC Lead.
Covered Homeless Organization	CHO	Any organization (including its employees, volunteers, affiliates, contractors, and associates) that records, uses or processes HMIS data elements for persons engaged by the CoC.
Data Quality	DQ	A measure of the validity and usefulness of data. Defined in this case as how accurately it portrays the conditions and operations of the CoC community.
Data Quality Improvement Plan	DQIP	Agreement between the CoC Lead and data-entering organization that establishes steps and benchmarks for data quality improvement for the data-entering organization.
Data Quality Management Plan	DQMP	The documented policies and procedures employed by a CoC to move toward its stated goals for data quality improvement and maintenance.
Department of Housing and Urban Development	HUD	Source of the majority of federal funding for CoC-participating organizations that establishes guidelines for HMIS data quality.
Domestic Violence	DV	Also called "inter-personal" or "intimate partner" violence, defined in this case as an experience of violence that qualifies a person for intervention from VAWA- and VOCA-funded entities.
DV HMIS Comparable Database	-	Database type required for DV-serving organizations (VSPs) funded by HUD as a substitute for participation in the CoC's HMIS.
Homeless Management Information System	HMIS	Database structure established by HUD for the collection of homeless services data. HUD-funded CHOs are required to participate in their CoC's HMIS, and the CoC is required to submit annual reports comprised of HMIS data elements.
HMIS Lead	-	CoC administrative entity charged with the operational management of the CoC's HMIS software. San Luis Obispo County is the HMIS Lead.

HMIS Participation	-	When A project collects all required data elements according to funder requirements and local CoC Policies and Procedures within the CoC's designated HMIS implementation, or that data is submitted to the CoC's designated HMIS implementation at least once a year to cover the whole year of required client data collected by the project.
Universal Data Elements	UDEs	HMIS data elements pertinent to clients and service interventions that are required across HMIS, regardless of funding type and that are generally applicable across project types.
Program-Specific Data Elements	PSDEs	HMIS data elements pertinent to clients and service interventions that are required by specific funding sources or for specific project type configurations.
Project Descriptor Data Elements	PDDEs	HMIS data elements that pertain to organization and project setup, essential for establishing the framework of service interventions for HMIS data collection and reporting.
Victim Service Provider	VSP	Term for a VAWA- or VOCA-funded organization who has at least one project that is dedicated to serving persons who have experienced DV.

Appendix II- Privacy Notice (Updated 2026)

San Luis Obispo County HMIS Privacy Notice

This Privacy Notice applies to all San Luis Obispo County HMIS-Participating Providers and addresses how information about you (client) shall be used and disclosed by Providers as well as rights over your information. This notice establishes minimum standards by which the Providers must follow. Providers may implement more stringent rules and procedures. This Notice may be amended at any time, and amendments may affect information obtained before the date of the amendment.

1. HMIS DATA COLLECTION & PURPOSE

A Homeless Management Information System (HMIS) is a local information technology system used to collect data on the housing and services provided to individuals and families experiencing homelessness and persons at risk of homelessness. This information is critical to better understand the extent and nature of homelessness at a local level, evaluate program effectiveness, and improve future housing and service provision. Providers may also be required by their funders to obtain certain additional information to determine eligibility, and to monitor outcomes.

This agency is an HMIS-participating homeless service provider ("HMIS Provider"). We collect information about the persons we serve in the shared County HMIS (HMIS) database. The agency shall only collect information deemed appropriate and necessary for program operation or information that is required by law or by the organizations that fund this program.

2. CONSENT

Through HMIS, we share your name, date of birth, age, gender, veteran status, and partial SSN ("Standard Information") with other HMIS Providers, unless you indicate that you do not want your Standard Information to be visible or tell an agency to mark your "Profile/Name" as private. You are still eligible for services if you refuse to have your standard information shared in HMIS.

Personal and Health Information: If you choose to sign the HMIS Consent for Release of Information (ROI), we will also share your enrollment information, which may include personal health information and information about your race, ethnicity, disabling conditions, previous residence history, employment history, substance abuse, sexual orientation, educational history and more. Your Standard Information and any information you release in your ROI is referred to as your Personally Identifiable Information (PII). This information will be visible in HMIS and may also be exchanged on paper, verbally or electronically based on uses and disclosures below.

Written consent to share your data in HMIS should be obtained at your first in-person meeting with the provider. Written consent may be obtained using the Electronic HMIS Consent for Release of Information, which indicates your consent to share your information.

Verbal consent to share your PII may only be obtained if the interaction meets the following criteria:

- The visit is not in person or not in a place conducive to paper or electronic signature.
- Agency staff reviews (or reads, if not in person) the Privacy Notice with you (posted at intake desk, on clipboard, via electronic methods or comparable location). An electronic link to the privacy notice can be found here (link).
- You verbally agree to provide and share personal information.
- Agency staff complete the Verbal Consent record in HMIS, attesting to their compliance with the procedure above.

3.PERMITTED USES AND DISCLOSURES

HMIS is designed to protect the confidentiality of personal information while allowing for reasonable, responsible, and limited uses and disclosures of data, including Personally Identifying Information. Once collected, we (as an HMIS Provider) have obligations about how these data may be used and disclosed (**uses** are internal activities for which providers interact with your PII; **disclosures** occur when providers share PII with an external entity). **We may use and disclose your PII only for the following purposes:**

To fulfill HUD Requirements:

(1) To allow you to access to your information; and

(2) Disclosures for oversight of compliance with HMIS privacy and security standards.

(3) To provide or coordinate services to an individual or household, including with other California Counties;

(4) For functions related to payment or reimbursement for services;

(5) To carry out administrative functions, including but not limited to legal, audit, personnel, oversight and management functions;

(6) For creating de-identified reports from PII including public dashboards;

Additional Uses and Disclosures: In rare instances we may use or disclose your Personally Identifying Information without your permission for the following purposes:

(7) Uses and disclosures required by law;

(8) Uses and disclosures to avert a serious threat to health or safety;

(9) Uses and disclosures about survivors of abuse, neglect or domestic violence; and

(11) Uses and disclosures for law enforcement when a subpoena is provided.

(12) For research or local analysis where a limited number of fields will be included.

HMIS Providers must also ensure that **any use or disclosure does not violate other applicable local, state, or federal laws**. Therefore, some HMIS Providers **may have more restrictive privacy policies**, often dependent upon funding source or the nature of a projects. Specific, per-project information regarding data use and disclosure can be obtained upon request. This can include agencies that must comply with the Health Insurance Portability and Accountability Act (HIPAA), Violence Against Women Act (VAWA). In these instances, the more restrictive policies take precedence.

4. UNDERSTANDING YOUR RIGHTS

HMIS recognizes every independent legal adult (person over 17 years of age) as the owner of all information about themselves, and any parent, legal guardian, or legal power of attorney as the designated owner of all information about any household members under their guardianship (all minors and any incapacitated/disabled adults).

By seeking assistance from this HMIS Provider and consenting to your personal information being shared within the HMIS, you transfer governance responsibility over your HMIS record to us, and we are responsible for handling your record in accordance with HMIS privacy policies and any applicable federal, state, or local requirements. You retain ownership of your information within your HMIS record, and as owner **you have the following rights, in general:**

- Your refusal to share information will not be used to deny you services at this agency.
- You have a right to see your information, request to change it, and have a copy of your information from the servicing agency by written request. You may also request assistance from this agency in documenting your history of homelessness to qualify for certain programs. An agency can refuse to change information but must provide you with a written explanation of the refusal within 60 days of the request[1]

[1] We can deny a request to inspect or copy your PII for the following reasons*: (1) Provider Right to Deny Review: if information is compiled in reasonable anticipation of litigation or comparable proceedings; (2) if information about another individual other than the participating provider staff would be disclosed; (3) if information was obtained under a promise of confidentiality other than a promise from this provider and disclosure would reveal the sources of the*

- Any information you provide related to race, color, religion, sex, national origin, disability, familial status, and actual or perceived sexual orientation, gender identity, or marital status will not be used in any way that would discriminate against you or prevent you from receiving services or housing assistance. You have the right to file a complaint if you feel that you have been discriminated against.
- You may request a copy of this Privacy Notice and other agency policies that explain HMIS and your rights associated with how information is kept and shared through HMIS.
- You may request that a provider mark your personal data as private (not shared) within HMIS; and
- You may withdraw your consent to share at any time by writing to the staff identified in our Agency Privacy Notice. However, any information already shared with another agency cannot be taken back. Your request to discontinue sharing will have to be coordinated between sharing partners. You should tell each agency that you work with when you withdraw your consent.
- The confidentiality of your records is protected by law. This agency will never give information about you to anyone outside the agency without your specific written consent through this release or as required by law (The regulations are the Federal Law of Confidentiality for Alcohol and Drug Abuse Patients, (42 CFR, Part 2) and the Health Insurance Portability and Accountability Act of 1996 (HIPPA), 45 CRF, Parts 160 & 164) and applicable California laws.
- **You should expect to provide additional, prior written consent for any use or disclosure of HMIS PII not included in the permitted uses and disclosures above.**

5. Requests and Grievance Policy

Agency Requests and Grievance

If you feel your privacy rights have been violated, or to request changes or copies of your records, please first submit a written request to the agency at which you are receiving services. Any privacy violations involving breaches of data will be reported to the HMIS Lead Agency. All other grievances must go through the grievance process at the agency at which you are receiving services. You cannot be retaliated against for filing a grievance. The grievance process may involve multiple steps for resolution. You may request to see the agency's full grievance process.

Escalated Grievance Policy

An escalated grievance is to only be used after you have worked with the agency to resolve an HMIS issue and that resolution was not satisfactory. The HMIS Grievance Form or a similar written format can be used if you feel your privacy rights have been violated by an HMIS Participating Agency.

You may submit this form to the HMIS Lead to the contacts below. This will be reviewed by HMIS Lead Staff and routed to an internal review body. It is against the law for any agency to take retaliatory action against you if you file this grievance. You can expect a response within 30 days via the method of your choice.

Grievances may be submitted in writing to:

County of San Luis Obispo Dept of Social Services
Attn: HMIS Program Manager
3433 S. Higuera St San Luis Obispo, CA 93401
Or
Via Email to: SS_hsdconcern@co.slo.ca.us

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information; or (4) if the disclosure of information would be reasonably likely to endanger the physical safety of any individual; and we can reject repeated or harassing requests for access or correction.

Appendix III- Consent for Release of Information (Updated 2026)

San Luis Obispo County Continuum of Care Homeless Management Information System

Consent for Release of Information

The San Luis Obispo County Continuum of Care (CoC) Homeless Management Information System (HMIS) is a secure database used to collect data on the housing and services provided to individuals and families experiencing homelessness and persons at risk of homelessness. Providers participating in a HMIS are required to collect universal data elements from all clients, including Personally Identifiable Information (PII), demographic characteristics, and residential history. This information is critical for providers and communities to better understand the extent and nature of homelessness at a local level, evaluate program effectiveness, and improve future housing and service provision. Some providers are also required by their funders to obtain certain additional information to determine eligibility, and to monitor outcomes. Most federally-funded homeless service providers are required to participate and record the clients they serve in an HMIS.
This Agency participates in HMIS and shares information with other HMIS Participating Agencies to help coordinate the most effective services for you and your household members.

What information is shared in HMIS?

Standard Information	**Personal and Health Information**
• Name • Date of Birth • Age • Gender • Veteran Status • Partial SSN • Race and Ethnicity	• Disabling Conditions, including substance use disorder and mental health conditions • Health Insurance Information • Homeless History • Employment Status • Sexual Orientation • Educational History • Domestic Violence Survivor data, if applicable.

How your information will be used?

- To provide or coordinate services on behalf of an individual or household;
- For payment or reimbursement for services;
- To carry out administrative functions, including but not limited to oversight and management functions; or
- For creating summary reports without identifying you or confusing you with someone else
- For additional, specific uses defined in the HMIS Privacy Policy.

Who can have access to your information?

Your information will be shared with other San Luis Obispo CoC HMIS Participating Agencies that agree to maintain the security and confidentiality of the information. For additional coordination of care and deduplication, your information may be shared with the Santa Barbara/Santa Maria CoC-CA 603 or the State of California’s Homeless Data Integration System, HDIS. A list of HMIS Participating Agencies is available upon

request.
U.S. Military Veterans Only: your personal information may be utilized to verify eligibility for housing and services with the U.S. Department of Veterans Affairs. Once determined eligible, your personal information will be shared with the VA as part of a coordinated effort to quickly resolve veterans' homelessness.

How is your personal information protected?

The information that is collected in HMIS is protected by limiting access to the database and by limiting with whom the information will be shared, in compliance with the standards set forth in federal, state and local regulations governing confidentiality of client records. Each person and agency that is authorized to read or enter data into HMIS has signed an agreement to maintain the security and confidentiality of the information. HMIS data is secured by passwords and encryption technology.

By signing this form, you understand and agree that:

- Your refusal to share information will not be used to deny you services at this agency.
- You have a right to see your information, request to change it, and have a copy of your information from the servicing agency by written request. You may also request assistance from this agency in documenting your history of homelessness to qualify for certain programs. An agency can refuse to change information but must provide you with a written explanation of the refusal within 60 days of the request.
- Any information you provide related to race, color, religion, sex, national origin, disability, familial status, and actual or perceived sexual orientation, gender identity, or marital status will not be used in any way that would discriminate against you or prevent you from receiving services or housing assistance. You have the right to file a complaint if you feel that you have been discriminated against.
- You may request a copy of this Privacy Notice and other agency policies that explain HMIS and your rights associated with how information is kept and shared through HMIS.
- You may request that a provider mark your personal data as private (not shared) within HMIS; and
- You may withdraw your consent to share at any time by writing to the staff identified in our Agency Privacy Notice. However, any information already shared with another agency cannot be taken back. Your request to discontinue sharing will have to be coordinated between sharing partners. You should tell each agency that you work with when you withdraw your consent.
- The confidentiality of your records is protected by law. This agency will never give information about you to anyone outside the agency without your specific written consent through this release or as required by law (The regulations are the Federal Law of Confidentiality for Alcohol and Drug Abuse Patients, (42 CFR, Part 2) and the Health Insurance Portability and Accountability Act of 1996 (HIPPA), 45 CRF, Parts 160 & 164) and applicable California laws.
- **You should expect to provide additional, prior written consent for any use or disclosure of HMIS PII not included in the permitted uses and disclosures above.**

Signature and Acknowledgement

Your signature indicates that you have read (or been read) this client consent form, have received answers to your questions. Check the appropriate box to indicate:

□ **Consent**: You willingly consent to have your information, and that of your minor children or dependents (if any), entered into the HMIS database. You also consent to share your information with other participating organizations as described in this consent form.

□ Veteran Only : You willingly consent to having your PII shared with the US Department of Veterans Affairs, this supports confirming your eligibility for veteran housing and resources.

□ **Decline**: You understand the information presented and you DO NOT want your Personal and Health Information shared. You understand that the Standard Information will still be shared, but not connected with this agency or program in HMIS.

_______________________________ _____________________________________ _______________

CLIENT NAME **SIGNATURE OF CLIENT** **DATE**

Signature of guardian or authorized-representative (when required): ______________________________

Relationship to client: __________________ Date signed by guardian/authorized representative: ______

This release of information also applies to the following dependents:

Last Name	**First Name**	**Date of Birth**

HUD System Performance Measures [FY 2026]	San Luis Obispo County CoC Client ID Selection: Clarity Unique Identifier Date Range: 10/01/2025 thru 08/31/2026

Measure 1: Length of Time Persons Experience Homelessness

Measure 1a	**Previous FY Universe (Persons)**	**Current FY Universe (Persons)**	**Previous FY Average LOT Experiencing Homelessness**	**Current FY Average LOT Experiencing Homelessness**	**Difference**	**Previous FY Median LOT Experiencing Homelessness**	**Current FY Median LOT Experiencing Homelessness**	**Difference**
Persons in ES-EE, ES-NbN, and SH	1,453	1,367	95.69	105.89	10.19	47	58	11
Persons in ES-EE, ES-NbN, SH, and TH	1,486	1,413	102.03	116.91	14.88	51	62	12

Measure 1b	**Previous FY Universe (Persons)**	**Current FY Universe (Persons)**	**Previous FY Average LOT Experiencing Homelessness**	**Current FY Average LOT Experiencing Homelessness**	**Difference**	**Previous FY Median LOT Experiencing Homelessness**	**Current FY Median LOT Experiencing Homelessness**	**Difference**
Persons in ES-EE, ES-NbN, SH, and PH	1,686	1,554	1,210.81	1,231.62	20.81	505	503	-2
Persons in ES-EE, ES-NbN, SH, TH, and PH	1,719	1,600	1,202.91	1,218.53	15.62	505	494	-11

Measure 2a and 2b: The Extent to which Persons Who Exit Homelessness to Permanent Housing Destinations Return to Homelessness within 6, 12, and 24 months

	Total Number of Persons who Exited to a Permanent Housing Destination	**Number Returning to Homelessness in Less than 6 Months (0 - 180 d)**	**Percentage of Returns in Less than 6 Months (0 - 180 d)**	**Number Returning to Homelessness from 6 to 12 Months (181 - 365 d)**	**Percentage of Returns from 6 to 12 Months (181 - 365 d)**	**Number Returning to Homelessness from 13 to 24 Months (366 - 730 d)**	**Percentage of Returns from 13 to 24 Months (366 - 730 d)**	**Number of Returns in 2 Years**	**Percentage of Returns in 2 Years**
Exit was from SO	134	20	14.93%	10	7.46%	10	7.46%	40	29.85%
Exit was from ES	257	30	11.67%	33	12.84%	21	8.17%	84	32.68%
Exit was from TH	5	1	20.00%	0	0.00%	1	20.00%	2	40.00%
Exit was from SH	0	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Exit was from PH	622	27	4.34%	25	4.02%	50	8.04%	102	16.40%
TOTAL Returns to Homelessness	**1,018**	**78**	**7.66%**	**68**	**6.68%**	**82**	**8.06%**	**228**	**22.40%**

Measure 3: Number of Persons Experiencing Homelessness

Metric 3.1 – Change in PIT counts of sheltered and unsheltered persons experiencing homelessness	**Previous FY PIT Count**	**Current FY PIT Count**	**Difference**

Universe: Total PIT Count of sheltered and unsheltered persons			
Emergency Shelter Total			
Safe Haven Total			
Transitional Housing Total			
Total Sheltered Count			
Unsheltered Count			

Metric 3.2 – Change in annual counts of persons experiencing sheltered homelessness in HMIS	Previous FY	Current FY	Difference
Universe: Unduplicated Total sheltered persons	1,488	1,427	-61
Emergency Shelter Total	1,455	1,381	-74
Safe Haven Total	0	0	0
Transitional Housing Total	35	46	11

Measure 4: Employment and Income Growth for Homeless Persons in CoC Program–funded Projects

Metric 4.1 – Change in earned income for adult system stayers during the reporting period	Previous FY	Current FY	Difference
Universe: Number of adults (system stayers)	37	31	-6
Number of adults with increased earned income	1	1	0
Percentage of adults who increased earned income	2.70%	3.23%	0.53%

Metric 4.2 – Change in non-employment cash income for adult system stayers during the reporting period	Previous FY	Current FY	Difference
Universe: Number of adults (system stayers)	37	31	-6
Number of adults with increased non-employment cash income	12	16	4
Percentage of adults who increased non-employment cash income	32.43%	51.61%	19.18%

Metric 4.3 – Change in total income for adult system stayers during the reporting period	Previous FY	Current FY	Difference
Universe: Number of adults (system stayers)	37	31	-6
Number of adults with increased total income	13	17	4
Percentage of adults who increased total income	35.14%	54.84%	19.70%

Metric 4.4 – Change in earned income for adult system leavers	Previous FY	Current FY	Difference
Universe: Number of adults who exited (system leavers)	15	19	4
Number of adults who exited with increased earned income	0	0	0
Percentage of adults who increased earned income	0.00%	0.00%	0.00%
Metric 4.5 – Change in non-employment cash income for adult system leavers	**Previous FY**	**Current FY**	**Difference**
Universe: Number of adults who exited (system leavers)	15	19	4
Number of adults who exited with increased non-employment cash income	7	6	-1
Percentage of adults who increased non-employment cash income	46.67%	31.58%	-15.09%
Metric 4.6 – Change in total income for adult system leavers	**Previous FY**	**Current FY**	**Difference**
Universe: Number of adults who exited (system leavers)	15	19	4
Number of adults who exited with increased total income	7	6	-1
Percentage of adults who increased total income	46.67%	31.58%	-15.09%
Measure 5: Number of Persons who Become Homeless for the First Time			
Metric 5.1 – Change in the number of persons entering ES, SH, and TH projects with no prior enrollments in HMIS	**Previous FY**	**Current FY**	**Difference**
Universe: Person with entries into ES-EE, ES-NbN, SH, or TH during the reporting period	1,271	1,221	-50
Of persons above, count those who were in ES-EE, ES-NbN, SH, TH, or any PH within 24 months prior to their start during the reporting year	564	602	38
Of persons above, count those who did not have entries in ES-EE, ES-NbN, SH, TH or PH in the previous 24 months. (i.e. number of persons experiencing	707	619	-88
Metric 5.2 – Change in the number of persons entering ES, SH, TH, and PH projects with no prior enrollments in HMIS	**Previous FY**	**Current FY**	**Difference**
Universe: Person with entries into ES-EE, ES-NbN, SH, TH or PH during the reporting period	2,162	1,861	-301
Of persons above, count those who were in ES-EE, ES-NbN, SH, TH, or any PH within 24 months prior to their start during the reporting year	775	786	11
Of persons above, count those who did not have entries in ES-EE, ES-NbN, SH, TH or PH in the previous 24 months. (i.e. Number of persons experiencing	1,387	1,075	-312
Measure 7: Successful Placement from Street Outreach and Successful Placement in or Retention of Permanent Housing			
Metric 7a.1 – Change in exits to permanent housing destinations	**Previous FY**	**Current FY**	**Difference**
Universe: Persons who exit Street Outreach	610	894	284

Of persons above, those who exited to specific homeless, temporary, and institutional destinations	87	131	44
Of the persons above, those who exited to permanent housing destinations	146	155	9
% Successful exits	38.20%	31.99%	-6.21%

Metric 7b.1 – Change in exits to permanent housing destinations	Previous FY	Current FY	Difference
Universe: Persons in ES-EE, ES-NbN, SH, TH and PH-RRH who exited, plus persons in other PH projects who exited without moving into housing	1,632	1,343	-289
Of the persons above, those who exited to permanent housing destinations	710	755	45
% Successful exits	43.50%	56.22%	12.72%

Metric 7b.2 – Change in exit to or retention of permanent housing	Previous FY	Current FY	Difference
Universe: Persons in all PH projects except PH-RRH who exited after moving into housing, or who moved into housing and remained in the PH project	569	522	-47
Of persons above, those who remained in applicable PH projects and those who exited to permanent housing destinations	465	481	16
% Successful exits/retention	81.72%	92.15%	10.43%

Data Quality	All ES, SH		All TH		All PSH, OPH		All RRH		All SO	
	Previous FY	Current FY	Previous FY	Current FY	Previous FY	Current FY	Previous FY	Current FY	Previous FY	Current FY
Unduplicated persons served (HMIS)	1,502	1,417	35	46	600	541	1,602	1,491	982	1,094
Total Leavers (HMIS)	1,071	728	5	22	165	69	870	916	564	735
Destination Issues (HMIS)	488	227	3	4	88	7	83	94	261	313
Enrollments Missing Date of Engagement (Excluded from DQ Universe)									126	325

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